

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE

JOSE MIGUEL RODRIGUEZ MARTINEZ
ANA LESLIE HERNANDEZ BAEZ

DEBTORS

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CASE NO. 15-03612 ESL

CHAPTER 13

**DEBTORS' MOTION REQUESTING ORDER
RE: AUTHORIZATION TO USE FUNDS FROM 2014 TAX REFUND**

TO THE HONORABLE COURT:

NOW COME, **JOSE MIGUEL RODRIGUEZ MARTINEZ and ANA LESLIE HERNANDEZ BAEZ**, debtors, through the undersigned attorney, and very respectfully state and pray as follows:

1. The debtors' confirmed Plan dated June 22, 2015, provides that debtors' tax refunds will be paid into the Plan. See docket no. 14.
2. The debtors received the 2014 tax refund in the sum of \$1,473.00. Attached is copy of the debtors' bank account which reflects the Treasury Department's tax refund electronic deposit, dated July 21, 2015.
3. The debtors respectfully submit to this Honorable Court that they need to use these funds to pay for back-to-school expenses, such as balance owed on the school tuition, books and other materials.
4. Attached to this motion is copy of receipts and invoices for these expenses.
5. The debtors need to use the funds from the 2014 "tax refund" to pay for these reasonable expenses. The debtors are living within a very "tight" budget which barely covers her daily expenses and a Plan payment of \$175.00.

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Debtors' Motion Requesting Order
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6. Based on the abovestated, the debtors respectfully request this Honorable Court to Order the authorization of the use of these funds to allow the debtors to pay for the above stated expenses with the 2014 tax refund.

WHEREFORE, debtors, through the undersigned attorney respectfully request that this Honorable Court grant the foregoing motion and allow the use of the funds from the debtors' 2014 tax refund.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, Jose Ramon Carrion Morales, Esq.; I also certify that a copy of this motion was sent to the debtors via US Mail to Jose M Rodriguez Martinez and Ana Leslie Hernandez Baez, Urb Delgado A 18 Calle 3 Caguas PR 00725.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 31st day of July, 2015.

/s/ Roberto Figueroa Carrasquillo
USDC #203614
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
ATTORNEY FOR PETITIONERS
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 FAX 787-746-5294
Email: rfigueroa@rfclawpr.com

Retail Account - History

CIF Key 00000000514677

Customer Name

JOSE M RODRIGUEZ MARTINEZ

Account 42003881

Transit

92015

Product Name

CUENTA DE AHORRO SCOTIA

Status

Active

Currency

05D

Account Information

History

SHUTTLE

Standing Order

Service Charges History

44-38861-1000

Document

of those Accounts

Current Balance

\$1,479.87

Available Balance

\$1,479.87

Balance Forward

\$314.66

Transaction Amount

0.00

Transaction Date (YYYYMMDD)

Retrieval

July 24, 2015 11:50:29 AM - Scotiabank - IAP/ITP Application (Top Page) - Windows Internet - \\Remote

Phone # 787-367-3974

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Contract Date: 6/22/2015

Ana L. Hernández Baéz
Calle Fernando Pla #13
Caguas, PR 00725

Rodriguez

Nombre del Estudiante: <u>Rodriguez</u>		Application Year:	2015-2016
Description	Est. Hours/Qty.	Rate	Total
Cuota de Matricula Regular para ingreso a Escuela		750.00	750.00
Descuento \$350 (Ad. Promo: Email Blast) en Matricula para ingreso a Escuela		-375.00	-375.00
Cuota de Mantenimiento		60.00	60.00
Cuota Seguro RP		30.00	30.00
Servicio "Compass Learning"		395.00	395.00
El balance será dividido en pagos de \$80.00 comenzando en Julio hasta Diciembre 2015.			
Firma del Contratante:	<u>[Signature]</u>	Total	\$860.00
Firma del Rep. Autorizado:			



INFORME Nº1
FECHA: 27/7/2015

Para: **Analeslie Hernández**

DE: ACADEMIA CRISTIANA ELOHIM

RELACIÓN A: MATRICULA RODRIGUEZ
CORRESPONDIENTE AL 6TO GRADO.

RECIBO DE PAGO

CANTIDAD	DESCRIPCIÓN	COSTO	PAGO	BALANCE
1	Matricula Año Escolar 2015-2016	\$900.00	\$450.00	\$450.00
BALANCE				\$450.00

**Costo no incluye Cuota de Servicios Suplementarios, Cuota de Graduación, y otros.*

¡GRACIAS!



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